

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
BALTIMORE DIVISION

JASON ALFORD, DANIEL LOPER,  
WILLIS McGAHEE, MICHAEL  
McKENZIE, JAMIZE OLAWALE, ALEX  
PARSONS, ERIC SMITH, CHARLES  
SIMS, JOEY THOMAS, and LANCE  
ZENO, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiffs,

vs.

THE NFL PLAYER DISABILITY &  
SURVIVOR BENEFIT PLAN, *et al.*,

Defendants.

Case No. 1:23-cv-00358-JRR

**[PROPOSED] ORDER SEALING EXHIBITS  
AND UNREDACTED MEMORANDUM**

Upon consideration of Plaintiffs' Motion to Seal ("Motion to Seal"), it is hereby

**ORDERED** that the Motion to Seal is **GRANTED**. Accordingly, it is further

**ORDERED** that (a) Exhibits 1-57 to the Declaration of Benjamin R. Barnett in Support of Plaintiffs Daniel Loper's, Jamize Olawale's, and Charles Sims' Opposition to Defendants' Motions For Summary Judgment, dated April 25, 2025 ("Barnett Declaration"), shall be sealed in their entirety; and (b) the unredacted version of the Consolidated Memorandum of Law in Opposition to Defendants' Motions for Summary Judgment as to Plaintiffs Daniel Loper, Jamize Olawale, and Charles Sims, dated April 25, 2025 ("Plaintiffs' Opposition Memorandum"), shall be sealed.

It is further **ORDERED** Plaintiffs shall have until **Friday, May 2, 2025** to file (a) the redacted, public version of Plaintiffs' Opposition Memorandum, and (b) the Barnett Declaration, with those accompanying exhibits that are not designated as Confidential Information or entitled

to provisional treatment as Confidential Information under the Stipulated Protective Order entered on September 30, 2024 (ECF No. 104).

Dated: \_\_\_\_\_, 2025

---

JULIE R. RUBIN  
United States District Judge